



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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<http://www.epa.gov/region08>

January 30, 2001

Ref: 8EPR-EP

Martha Ketelle
Forest Supervisor
White Wide River National Forest
P.O. Box 948
Glenwood Springs, Colorado 81602

Re: Baylor Park Blowdown,
DEIS Review No. 000486

Dear Ms. Ketelle:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, Region 8 of the Environmental Protection Agency (EPA) has reviewed the *Draft Environmental Impact Statement (DEIS) for the Baylor Park Blowdown* on the White River National Forests, dated December 2000. We offer the following concerns and comments for your consideration as you complete the Final Environmental Impact Statement (FEIS). EPA's main concerns from reviewing the DEIS are improving the disclosure of impacts from the logging in Section 16 and improving mitigation for impacts on the roadless character of the area. Our comments are listed below.

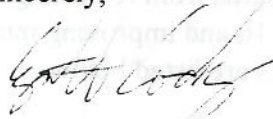
1. As stated in Section 3.7.2.5 Cumulative Effects, on page 3-55, "Past management activities have had a significant effect on the watershed resources within the planning area. The four most impacting activities have been road building, livestock grazing, water diversions, and non-native fish introductions." It appears from the discussions of each watershed on pages 3-43 - 3-45, that there are existing roads causing sedimentation problems, through wetlands, and unreclaimed temporary roads. We recommend that the Forest Service select an alternative which will mitigate some of these past impacts and at the least not worsen existing conditions. This could be accomplished by minimizing new roads and skid trails or by offsetting new roads impacts by removing existing roads, particularly those causing sediment problems or through wetlands.
2. A map should be developed overlaying both the timber management units and proposed roads found on pages 2-9 through 2-12, and the RARE II roadless area Figure 3.4. Without this type of information it is difficult to judge the proximity of the proposed alternatives and the roadless areas.

3. The FEIS should include a description of the location, type and value of the wetlands that will be impacted by the timber harvest and roads. It is particularly important to determine if any of the wetlands that may be impacted are fens. Fens are a very valuable type of wetlands which generally cannot be repaired or replaced. Alternatives 2, 3, and 4 indicate harvesting timber in 51, 24 and 30 acres respectively of wetlands. In alternatives 2 and 4 wetlands may be permanently impacted by roads either through direct impacts or by altering wetlands hydrology (pages 3-51 through 3-54).
4. The DEIS should also explain more fully how wetlands will be protected. For example will there be buffers between the timber harvest and wetlands? For wetland areas that will be logged how successful have the recommended mitigation measures then in the similar locations. For example, how the time will be necessary for the wetland to recover its pre-logging values? Are timber salvage contracts set up to require waiting until favorable logging conditions are present (i.e. dry conditions)?

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, the environmental analysis for the *DEIS for Baylor Park Blowdown* will be listed in the Federal Register in the category EC-2. This means that the review has identified environmental impacts that should be avoided in order to fully protect the environment, and the DEIS does not contain sufficient information to thoroughly assess environmental impacts. Enclosed is a summary of EPA's rating definitions.

We appreciate your interest in our comments. Please contact Dana Allen at (303) 312-6870 if you have any questions about these comments.

Sincerely,



Cynthia Cody
Chief, NEPA Unit
Office of Ecosystems Protection
and Remediation

Enclosure